



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*One Saint Andrew's Plaza
New York, New York 10007*

April 7, 2021

By ECF and Email
Hon. Lewis Kaplan
United States District Judge
Southern District of New York
500 Pearl St.
New York, New York 10007-1312

Re: United States v. Donald Laguardia
19 Cr. 893 (LAK)

Dear Judge Kaplan:

The Government respectfully submits this letter in response to the defendant's request for a 60-day adjournment of sentencing. The Government consents to the defendant's request.

The parties have been making substantial progress toward resolution of material factual differences that could otherwise require an evidentiary hearing, and the Government agrees with defense counsel that a short adjournment may facilitate the narrowing or resolution of the remaining issues.

To the extent that the Court is inclined to grant the defendant's request for an adjournment, the Government respectfully requests that that Court schedule the sentencing on or after the June 21, 2021 date proposed by the defendant, as the undersigned has a several-week trial before Judge Seibel scheduled to begin on May 17, 2021.

The Government takes no position on the defendant's proposal to work with Global International Advisors in a capacity that would not involve contact with investors or potential investors. Furthermore, the Government is not prepared at this time to consent to any future request by the defendant to further adjourn sentencing in order to provide time for him to repay the victim investors.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: _____/s/_____
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